

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CONTRARIAN CAPITAL MANAGEMENT,  
L.L.C., CONTRARIAN CAPITAL FUND I,  
L.P., CONTRARIAN DOME DU GOUTER  
MASTER FUND, LP, CONTRARIAN  
CAPITAL SENIOR SECURED, L.P.,  
CONTRARIAN EM II, LP, CONTRARIAN  
EMERGING MARKETS, L.P., POLONIUS  
HOLDINGS, LLC, and CONTRARIAN  
FUNDS, L.L.C.,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Case No. 19 Civ. 11018 [rel.  
Nos. 19 Civ. 3123 & 18 Civ.  
11940]

Hon. Analisa Torres

**NOTICE OF MOTION FOR A STAY**

**PLEASE TAKE NOTICE THAT**, upon the accompanying Memorandum of Law, dated July 13, 2020, Defendant Bolivarian Republic of Venezuela (“the Republic”), by and through its undersigned counsel, move the Honorable Analisa Torres, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order staying this case pursuant to the Court’s inherent authority and international comity, and for such further relief as the Court deems just, necessary, and proper.

**PLEASE TAKE FURTHER NOTICE THAT**, in accordance with the June 1, 2020 Scheduling Order entered in these actions, ECF No. 59, Plaintiffs’ reply in support of their motion for summary judgment and Plaintiffs’ opposition to Defendant’s motion for a stay are to

be filed by July 27, 2020; and Defendant's reply in support of its motion for a stay is to be filed by August 10, 2020.

**Dated:** July 13, 2020  
New York, New York

Respectfully submitted,

*/s/ Joseph E. Neuhaus*

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